

EXHIBIT B



UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
MINHYE PARK,

Plaintiff,

-against-

DAVID DENNIS KIM, M.D.,

Defendant.
-----X

Index No.: 1:20-cv-02636

NOTICE OF DEPOSITION

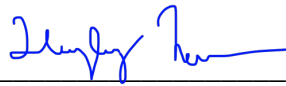
PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, the defendant DAVID DENNIS KIM, M.D., by and through his attorneys, HEIDELL, PITTONI, MURPHY & BACH, L.L.P., will take the deposition upon oral examination of MINHYE PARK on the 30th day of March 2021 at 10:00 a.m. EST and will continue consistent with Rule 30(d) until it is completed. The deposition will take place via videoconferencing and to be recorded via stenographic means with Deitz Lexitas Reporters, before a Notary Public of the State of New York or other person duly qualified to administer oaths under the Federal Rules of Civil Procedure. A court certified Korean interpreter will be retained for the deposition.

Said party is to be examined on all evidence material and necessary in the defense of this action.

Dated: New York, New York
November 20, 2020

Respectfully submitted,

HEIDELL, PITTONI, MURPHY & BACH, LLP

By: _____

HAYLEY B. NEWMAN (HN 5509)

Attorneys for Defendant

DAVID DENNIS KIM, M.D.

99 Park Avenue, 7th Floor

New York, New York 10016

Tel.: (212) 286-8585

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TO: **VIA EMAIL - jae@lawjsl.com AND REGULAR MAIL**

Jae Lee, Esq.

JSL LAW OFFICES, P.C.

Attorneys for Plaintiff

626 RXR Plaza

Uniondale, NY 11556

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HEIDELL, PITTONI, MURPHY & BACH, LLP
Attorneys for Defendant
99 Park Avenue
New York, NY 10016
T: (212) 286-8585
F: (212) 490-8966

Service of a copy of the within _____ is hereby admitted.

Dated: _____ Signature: _____
Attorney(s) for _____

PLEASE TAKE NOTICE

- ☐ NOTICE OF ENTRY
- that the within is a (certified) true copy of a _____ entered
in the office of the clerk of the within named Court on _____, 20____.
- ☐ NOTICE OF SETTLEMENT
- that an Order of which the within is a true copy will be presented for settlement to the
Hon. _____ one of the judges of the within named Court,
at _____ on , _____, 20____. at
_____ a.m./p.m.

Dated:

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
 : ss.:
COUNTY OF QUEENS)

MARLENE NUWESRA, being duly sworn, deposes and says:

Deponent is not a party to the action, is over 18 years of age and is employed by Heidell, Pittoni, Murphy & Bach, LLP.

On November 20, 2020 deponent served the within NOTICE OF DEPOSITION, upon the following attorney in this action at the email address designated by said attorney for that purpose by delivering a true copy of same VIA ELECTRONIC MAIL. Email confirmation is annexed hereto.

TO: **VIA EMAIL - jae@lawjsl.com**
Jae Lee, Esq.
JSL LAW OFFICES, P.C.
Attorneys for Plaintiff
626 RXR Plaza
Uniondale, NY 11556

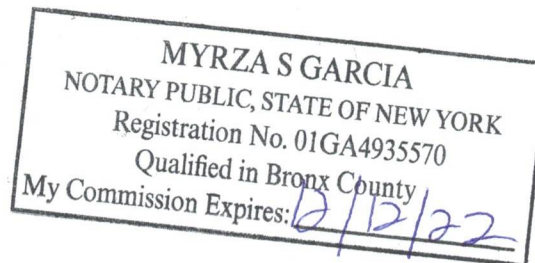
Marlene Nuwesra

MARLENE NUWESRA

Sworn to before me this

20 day of Nov 2020

Myrza Garcia
NOTARY PUBLIC



Nuwesra, Marlene

From: Nuwesra, Marlene
Sent: Friday, November 20, 2020 9:49 AM
To: 'jae@lawjsl.com'
Cc: Newman, Hayley B.
Subject: Minhye Park v. David Dennis Kim, M.D. / Notice of Deposition
Attachments: PARK NOTICE OF DEPOSITION.pdf

On behalf of Hayley Newman, Esq., please see the attached Notice of Deposition with reference to this matter. Thank you.

Marlene Nuwesra
Legal Secretary
Heidell, Pittoni, Murphy & Bach, LLP
99 Park Avenue
New York, NY 10016
Tel: (212) 286 - 8585
Fax: (212) 490 - 8966
www.hpmb.com



Nuwesra, Marlene

From: Microsoft Outlook
To: 'jae@lawjst.com'
Sent: Friday, November 20, 2020 9:49 AM
Subject: Relayed: Minhye Park v. David Dennis Kim, M.D. / Notice of Deposition

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

['jae@lawjst.com' \(jae@lawjst.com\)](mailto:'jae@lawjst.com' (jae@lawjst.com))

Subject: Minhye Park v. David Dennis Kim, M.D. / Notice of Deposition

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)

: ss.:

COUNTY OF NEW YORK)

JAMES SCOTT, being duly sworn, deposes and says:

Deponent is not a party to the action, is over 18 years of age and is employed by
CANON BUSINESS PROCESS SERVICES.

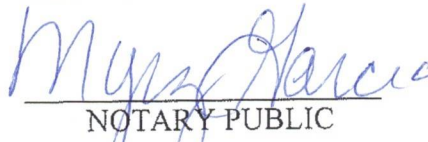
On November 20, 2020, deponent served the within NOTICE OF DEPOSITION upon
the following party in this action at the address so indicated by delivering a true copy of same
enclosed in a post-paid, properly addressed wrapper in an official depository under the
exclusive care and custody of the United States Postal Service within the State of New York.

TO: Jae Lee, Esq.
JSL LAW OFFICES, P.C.
Attorneys for Plaintiff
626 RXR Plaza
Uniondale, NY 11556


JAMES SCOTT

Sworn to before me this

20 day of November 2020


NOTARY PUBLIC

